

Applicant : Chinmoy Panda
Serial No. : 09/535,441
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Attorney's Docket No.: 07844-364001 / P339

REMARKS

Claims 1-12 and 27-40 are currently pending of which claims 1, 27, and 29 are independent. Reconsideration of the action mailed May 21, 2004, is respectfully requested in light of the following remarks.

The Examiner rejected claims 1-2, 6, 8-11, 27-30, 34, and 36-39 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,021,412 to Ho et al. ("Ho") in view of U.S. Patent No. 6,247,009 B1 to Shiiyama et al. ("Shiiyama") and U.S. Patent No. 5,404,435 to Rosenbaum ("Rosenbaum").

The Examiner rejected claims 3-5 and 31-33 under 35 U.S.C. § 103(a) as being unpatentable over Ho in view of Shiiyama and Rosenbaum and further in view of U.S. Patent No. 6,480,837 to Dutta ("Dutta"). The Examiner rejected claims 7 and 35 under 35 U.S.C. § 103(a) as being unpatentable over Ho in view of Shiiyama and Rosenbaum and further in view of U.S. Patent No. 6,526,170 to Matsumoto ("Matsumoto"). Applicant respectfully traverses the rejections.

Section 103(a) Rejections

Claim 1 stands rejected as unpatentable over Ho in view of Shiiyama and Rosenbaum. Claim 1 requires that there be a document, that keywords be extracted from the document, and that there be a plurality of images located in the document. The claim further requires that for each pair of such keyword and image, that a proximity factor be generated. So, to give a specific example, if four keywords are extracted and there are five images in the plurality of images, twenty (20) proximity factors will be generated, each one relating a distinct keyword-image pair, where both keyword and image are found in the one document.

Ho describes techniques for adding images to an existing document. *See* col. 1, lines 38-40. Keywords are identified in the document and representative images are searched for in an image library. *See* col. 1, lines 53-67. Thumbnail representations of the image are presented to a user and for selection to be included in the document. *See* col. 1, line 67 to col. 2, line 5. Ho does not disclose or suggest a proximity factor generated for each pair of a keyword and an

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image in a document, where the image is one of a plurality of images in a document and the keyword is one of one or more keywords extracted from a same document.

The Examiner states that Shiiyama discloses a proximity factor generated for each pair of a keyword and an image in a document in FIG. 4; col. 3, lines 65-67; col. 5, line 6 to col. 6 line 36; col. 7, lines 40-58, col. 8, line 65 to col. 9, line 1; and col. 10, line 24 to col. 11, line 19. Applicant respectfully disagrees. Shiiyama describes techniques for searching an image database. *See* col. 4, lines 1-5. A user inputs keywords and images are presented to the user based on the keyword search results. *See* col. 10, lines 32-49. The results are then presented to the user as thumbnail images. *See* col. 11, lines 10-12.

Shiiyama does not disclose or suggest a method (claim 1), an apparatus (claim 27), or a computer program product (claim 29) that act on a document having multiple images from which keywords are extracted. The images in Shiiyama come from an image database and the keywords are from a user input. Shiiyama furthermore does not disclose or suggest a proximity factor for each pair of one of the plurality of images and one of the extracted document keywords, as required by claim 1.

Rosenbaum discloses a system for storing documents that include non-text objects. The non-text objects can later be retrieved from storage separately from the document. *See* col. 1, line 63 to col. 2, line 2. Rosenbaum does not disclose or suggest a proximity factor generated for a pair of a keyword and an image, where the keyword is extracted from the document and the image is one of a plurality of images in the document. For at least the foregoing reasons, Applicant respectfully submits that claim 1, as well as claims 2-12, which depend from claim 1, are in condition for allowance.

Independent claims 27 and 29 stand rejected as unpatentable over Ho in view of Shiiyama and Rosenbaum. They and their respective dependent claims are allowable for the reasons set forth above in reference to claim 1.

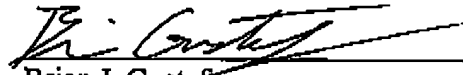
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Applicant respectfully requests that all pending claims be allowed. Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

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